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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**

12 CARACAL ENTERPRISES LLC, and
13 CARACAL CONSULTING INC.,

14 Plaintiffs,

15 v.

16 ROBERT SURANYI, ROBERT SURANYI
SYSTEMS SUPPORT, PASSPORT, INC.
17 and PASSPORTPARKING, INC.,

18 Defendants.
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CASE NO. 3:16-CV-5073 (RS)

STIPULATION AND ~~PROPOSED~~
ORDER:

- (1) **EXTENDING TIME FOR
DEFENDANT
PASSPORTPARKING, INC. TO
RESPOND TO THE FIRST
AMENDED COMPLAINT AND**
- (2) **EXTENDING TIME FOR THE
CASE MANAGEMENT
CONFERENCE**

Complaint Served: October 6, 2016

28 STIPULATION TO EXTEND TIME FOR
PASSPORTPARKING, INC. TO RESPOND TO
INITIAL COMPLAINT

Case No. 3:16-CV-5073 (RS)

Plaintiffs Caracal Enterprises LLC and Caracal Consulting Inc. (collectively “Plaintiffs”) and defendant PassportParking, Inc. (“Passport”) hereby stipulate and agree that:

1. Plaintiffs and Passport are discussing the case and whether it can be resolved as between them; and

2. Defendants Robert Suranyi and Robert Suranyi Systems Support were served using The Hague Convention and have yet to enter an appearance beyond filing a stipulation extending their time to respond to the complaint.

3. Accordingly, to avoid unnecessary expenditure of effort, and allow time for all parties to appear, Plaintiffs have granted all defendants an additional 30-day extension of the deadline to answer or otherwise respond to Plaintiffs’ First Amended Complaint. This is the second extension of time for Passport and does not alter any deadlines already fixed by the Court.

4. For those same reasons, the Plaintiffs and Passport also agree, subject to court approval, to extend the time for the Case Management Conference (“CMC) by sixty (60) days. The CMC is currently scheduled for Thursday, December 15, 2016, and the parties agree to extend the CMC date until Thursday, February 16, 2017 or as soon thereafter as is convenient for the court.

DATED: November 29, 2016

GREENBERG TRAURIG, LLP

By: /s/ Ian C. Ballon
Ian C. Ballon

Attorneys for defendant
PASSPORTPARKING, INC.

DATED: November 29, 2016

SMITH, GAMBRELL & RUSSELL, LLP

By: /s/ Edward A. Pennington
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Attorneys for Plaintiffs
CARACAL ENTERPRISES LLC and
CARACAL CONSULTING INC.

ATTESTATION CLAUSE

I, Ian Ballon, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER: (1) EXTENDING TIME FOR DEFENDANT PASSPORTPARKING, INC. TO RESPOND TO THE FIRST AMENDED COMPLAINT AND (2) EXTENDING TIME FOR THE CASE MANAGEMENT CONFERENCE. In compliance with Civil L.R. 5-1(i), I hereby attest that all signatories concurred in this filing.

DATED: November 29, 2016

GREENBERG TRAURIG, LLP

By: /s/ Ian C. Ballon
Ian C. Ballon

Attorneys for defendant
PASSPORTPARKING, INC.

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference is rescheduled for February 16, 2017 at 10:00 a.m. The parties shall file a Joint Case Management Statement at least one week prior to the Conference.

Dated: November 30, 2016


Richard Seeborg
United States District Judge